

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TEXAS DEMOCRATIC PARTY, GILBERTO §
HINOJOSA, Chair of the Texas Democratic §
Party, JOSEPH DANIEL CASCINO, §
SHANDA MARIE SANSING, and §
BRENDA LI GARCIA §
Plaintiffs, §
§
v. §
§ Case No. 5:20-cv-00438
GREG ABBOTT, Governor of Texas; RUTH §
HUGHS, Texas Secretary of State, DANA §
DEBEAUVOIR, Travis County Clerk, and §
JACQUELYN F. CALLANEN, Bexar County §
Elections Administrator §
Defendants. §

**UNOPPOSED MOTION OF THE REPUBLICAN PARTY OF TEXAS FOR LEAVE
TO FILE AMICUS BRIEF IN OPPOSITION TO
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

The Republican Party of Texas (“RPT”) respectfully asks this Court for leave to file an amicus brief in opposition to Plaintiffs’ Motion for Preliminary Injunction.¹ All parties have consented to the filing of this motion.²

¹ No party’s counsel authored the attached brief in whole or in part, and no one other than amicus and its counsel contributed money to fund the brief’s preparation or submission.

² Counsel for all parties have consented to the filing of this Amicus Brief as of May 13, 2020.

INTEREST OF PROPOSED AMICUS CURIAE

The Republican Party of Texas is a political party recognized by the Texas Election Code. We believe that elections are fair when the process by which elections are conducted is consistent and predictable. We support elections free from the flames of fear and uncertainty fanned by the Texas Democratic Party and liberal activists, whose true goal is to create a voting environment where checks and balances are few, and voter fraud can thrive. Our focus is to ensure that elections are conducted safely and consistently with the letter and spirit of the laws of Texas. Challenges to duly enacted election procedures, such as those brought by Plaintiffs in the present case, can only damage the integrity and legitimacy of the election results. After all, “there must be a substantial regulation of elections if they are to be fair and honest and if some sort of order, rather than chaos, is to accompany the democratic processes.” *Storer v. Brown*, 415 U.S. 724, 730 (1974). The Republican Party of Texas thus has a significant interest in this important case.

ARGUMENT

RPT’s brief will be useful to the Court’s resolution of the important issues in this case. The brief highlights the Republican Party’s unique perspective regarding the Supreme Court’s *Purcell* doctrine and its application to the present case. Specifically, there is strong public interest in the orderly administration of elections and the remedy Plaintiffs seek would wreak havoc on Texas’s election process. This disorder stems from the extreme proximity to the upcoming primary elections.

CONCLUSION

For the foregoing reasons, the Republican Party of Texas respectfully requests this Court grant this motion for leave to file its Amicus Brief.

This the 13th day of May, 2020. Respectfully submitted,

REPUBLICAN PARTY OF TEXAS

Wade Emmert*
General Counsel
Republican Party of Texas
Texas State Bar No. 00793688
Emmert Law Firm, PC
100 Crescent Court, Suite 700
Dallas, TX 76013
Telephone: (469) 607-4502
Facsimile: (469) 436-6378
wade@emmertlaw.com

*Counsel admitted but currently on inactive status. Readmission fee submitted.

By: /s/ Dallin B. Holt
Dallin B. Holt
Texas State Bar No. 24099466
Holtzman Vogel Josefiak Torchinsky PLLC
34 N. Hill Dr., Suite 100
Warrenton, VA 20186
Telephone: (540) 341-8808
Facsimile: (540) 341-8809
dholt@hvjt.law

ATTORNEYS FOR *AMICUS CURIAE*

CERTIFICATE OF SERVICE

I do hereby certify that, on this 13th day of May 2020, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Dallin B. Holt
Dallin B. Holt

Counsel for Amicus Republican Party of Texas